

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS : Consolidated Under
LIABILITY LITIGATION (No. VI) : MDL DOCKET NO. 875

This Scheduling Order Relates to: : E.D. Pa. Nos.

Knezevic v. A.W. Chesterton Co., et al. : 13-60009
Jacobs v. Owens-Illinois Inc., et al. : 13-60011
Stanford, Jr. v. Bldg. Servs. Indust. Supply Inc. et al.: 13-60012
Zickert v. Bayer Crop Sci. Inc., et al. : 13-60013
Sebastian v. Owens-Illinois Inc., et al. : 13-60014

FILED

SEP 12 2013

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

SCHEDULING ORDER

AND NOW, this 12th day of September, 2013, pursuant to Judge Robreno's order referring these cases to us, it is hereby **ORDERED** that the following discovery and pretrial management deadlines shall apply:

1. The Standard Interrogatories adopted by the court on October 5, 2010¹ are deemed served as of this date and shall be responded to by plaintiffs as provided for in the Federal Rules of Civil Procedure.
2. Plaintiffs' counsel shall provide to defense counsel signed copies of the Authorization Form for Use and Disclosure of Protected Health Information (Medical Records) Pursuant to HIPAA² by **September 26, 2013**.
3. All Fed. R. Civ. P. 26(a) initial disclosures must be served by **October 3, 2013**.
4. While procuring documents pursuant to the authorizations, the parties are bound by the Records Collection Protocol³ adopted by the court on November 9, 2011.
5. All records collected pursuant to The Records Collection Protocol as well as all other paper discovery shall be completed by **November 7, 2013**. The parties may not take depositions during this time except by agreement or for good cause and after obtaining permission from the court.

¹ www.paed.uscourts.gov/documents/MDL/MDL875/CV 1.pdf and CV 2.pdf

² 01-MD-875 Docs. 8058 and 8074

³ 01-MD-875 Doc. No. 8262

6. Notwithstanding the above, the parties may proceed with depositions of co-workers by agreement after the plaintiffs' counsel have provided adequate information in writing and satisfactory to all defendants regarding where and when the co-worker worked with the plaintiff.

7. All remaining discovery, including all fact witness depositions, shall be completed by **January 16, 2014**. Depositions shall be governed by the Amended Protocol for Plaintiff and Co-Worker Depositions to Be Taken in Cascino Vaughan Law Office MDL 875 Cases Assigned to Magistrate Judge David R. Strawbridge (as amended April 2, 2012).⁴

8. The collection of any pertinent bankruptcy records shall be governed by the Authorization for Release of Bankruptcy Records adopted by the court on December 14, 2011.⁵

9. Before attempting to file a motion related to a discovery dispute, the parties shall, in good faith, meet, confer, and attempt to resolve the issue. Failing that, the parties may contact Joel Lang (joel_lang@paed.uscourts.gov) or my chambers to schedule a conference call regarding the issue. The parties are precluded from filing motions regarding such disputes without leave of court.

10. Plaintiffs' expert reports must be served by **February 6, 2014**.

11. Defendants' expert reports must be served by **February 27, 2014**.

12. All expert discovery must be completed by **March 13, 2014**.

13. Any dispositive motions must be filed by **April 3, 2014**.

14. Responses to any dispositive motions must be filed by **April 24, 2014**.

15. Replies to any dispositive motions must be filed by **May 8, 2014**.

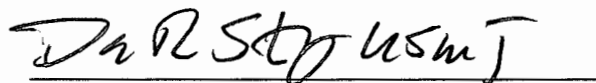
16. Discovery must be propounded and answered in accordance with the Federal Rules of Civil Procedure, unless subject to a written agreement by the parties.

17. We are available to conduct settlement conferences at any time, subject to reasonable notice, upon agreement of all applicable parties. For any settlement conference, we will expect the parties to bring a client representative with full settlement authority.

⁴ See 08-90330 Doc. No. 87, Exh. A

⁵ 01-MD-875 Doc. No. 8318

BY THE COURT:

A handwritten signature in black ink, reading "David R. Strawbridge" in a cursive style, positioned above a horizontal line.

DAVID R. STRAWBRIDGE
UNITED STATES MAGISTRATE JUDGE